

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SUMMER CAMPBELL,

Plaintiff,

v.

LIBERTY MUTUAL INSURANCE,

Defendant.

Case No. 1:23-cv-05101

Judge John F. Kness

**MOTION FOR WITHDRAWAL AS COUNSEL FOR DEFENDANT**

Defendant Liberty Mutual Group, Inc. (“Defendant”), by and through its counsel and pursuant to Local Rule 83.17, moves to withdraw Kyla J. Miller as counsel of record in the above-captioned action. In support of this motion, Defendant states as follows:

1. Attorney Erin Dougherty Foley of the law firm of Seyfarth Shaw LLP, will continue to represent Defendant in this matter.
2. Effective March 4, 2024, Attorney Miller resigned from Seyfarth Shaw LLP and no longer serves as counsel for the Defendant.
3. Defendant will not be harmed or prejudiced by Attorney Miller’s withdrawal, as the Defendant will continue to be represented by Attorney Erin Dougherty Foley, neither will Plaintiff be prejudiced if Defendant’s motion is granted.

WHEREFORE, Defendant respectfully requests that this Court enter an order withdrawing Kyla Miller as counsel of record for Defendant Liberty Mutual Insurance, and that her name also be removed from the Court’s ECF filing notification list for this case, and for such other relief as this Court deems just.

DATED: March 8, 2024

Respectfully submitted,

LIBERTY MUTUAL GROUP INC.

By: /s/ Erin Dougherty Foley  
One of Its Attorneys

Erin Dougherty Foley, Bar No. 06269791  
edfoley@seyfarth.com  
Kyla J. Miller, Bar No. 6327325  
kjmiller@seyfarth.com

SEYFARTH SHAW LLP  
233 South Wacker Drive  
Suite 8000  
Chicago, Illinois 60606-6448  
Telephone: (312) 460-5000  
Facsimile: (312) 460-7000

Attorneys for the Defendant

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on March 8, 2024, the foregoing Defendant's Motion to Withdraw as Counsel Kyla J. Miller was electronically filed with the Clerk of the Court using the CM/ECF system, and that a copy of the foregoing was served on all counsel of record via the Court's CM/ECF system

/s/ Erin Dougherty Foley